

**FILED**

**6/9/2025**

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN THE MATTER OF THE  
GOVERNMENT'S OMNIBUS MOTION  
TO WITHDRAW FORMER COUNSEL

Nos. [Identified in Exhibit A]  
Hon. Virginia M. Kendall  
Chief Judge

**GOVERNMENT'S OMNIBUS MOTION TO  
WITHDRAW FORMER COUNSEL**

Now comes the UNITED STATES OF AMERICA, by ANDREW S. BOUTROS, United States Attorney for the Northern District of Illinois, and states as follows in support of its Omnibus Motion to Withdraw Former Counsel, and respectfully states as follows:

1. The individuals identified in Exhibit A ("List of Former Government Counsel and Related Matters") to this motion previously served as Assistant United States Attorneys or as Special Assistant United State Attorneys with the U.S. Attorney's Office for the Northern District of Illinois but are no longer employed by the government and/or are no longer serving as government counsel on certain matters described below (the "Former Government Counsel").

2. The Former Government Counsel have appearances on file on behalf of the United States in the matters identified in Exhibit A.

3. Because the Former Government Counsel no longer represent the United States in the matters identified in Exhibit A, they should be withdrawn as counsel in such matters.

For the reasons stated herein, the government hereby moves this Court to grant it leave to withdraw the Former Government Counsel from the matters identified in Exhibit A.

Respectfully submitted,

ANDREW S. BOUTROS  
United States Attorney

By: /s/Christopher K. Veatch  
CHRISTOPHER K. VEATCH  
Assistant United States Attorney  
219 S. Dearborn Street, Rm. 500  
Chicago, Illinois 60604  
(312) 886-3389

**Exhibit A****List of Former Government Counsel and Related Matters**

| <b>Former Government Counsel</b> | <b>Case Number</b>        |
|----------------------------------|---------------------------|
| Andrew Dixon                     | 1:03-cr-00242             |
| Andrew Dixon                     | 1:19-cr-00158             |
| Andrew Dixon                     | 1:19-cr-00744             |
| Andrew Dixon                     | 1:20-cr-00129             |
| Andrew Dixon                     | 1:20-cr-00130             |
| Andrew Dixon                     | 1:20-cr-00225             |
| Andrew Dixon                     | 1:20-cr-00385             |
| Andrew Dixon                     | 1:20-cr-00404             |
| Andrew Dixon                     | 1:20-cr-00418<br>*SEALED* |
| Andrew Dixon                     | 1:20-cr-00419             |
| Andrew Dixon                     | 1:21-cr-00501             |
| Andrew Dixon                     | 1:22-cr-00151             |
| Andrew Dixon                     | 1:22-cr-00279             |
| Andrew Dixon                     | 1:23-cr-00125             |
| Andrew Dixon                     | 1:23-cv-16521             |
| Benjamin Christenson             | 1:19-cr-00280             |
| Benjamin Christenson             | 1:22-cr-00140             |
| Benjamin Christenson             | 1:22-cr-00675             |
| Benjamin Christenson             | 1:23-cr-00016             |
| Benjamin Christenson             | 1:23-cr-00338             |
| Benjamin Christenson             | 1:23-cr-00339             |
| Benjamin Christenson             | 1:23-cr-00340             |
| Benjamin Christenson             | 1:23-cr-00411             |
| Benjamin Christenson             | 1:23-cr-00507<br>*SEALED* |
| Benjamin Christenson             | 1:23-cr-00523<br>*SEALED* |
| Benjamin Christenson             | 1:23-cr-00533             |
| John Mitchell                    | 1:17-cr-00319             |
| John Mitchell                    | 1:17-cr-00522             |
| John Mitchell                    | 1:18-cr-00356             |
| John Mitchell                    | 1:19-cr-00553<br>*SEALED* |
| John Mitchell                    | 1:19-cr-00641             |
| John Mitchell                    | 1:20-cr-00288             |
| John Mitchell                    | 1:20-cr-00303<br>*SEALED* |
| John Mitchell                    | 1:20-cr-00573             |

|                 |                           |
|-----------------|---------------------------|
| John Mitchell   | 1:20-cr-00897             |
| John Mitchell   | 1:20-cr-00898<br>*SEALED* |
| John Mitchell   | 1:20-cr-00899             |
| John Mitchell   | 1:21-cr-00182             |
| John Mitchell   | 1:21-cr-00614             |
| John Mitchell   | 1:22-cr-00006<br>*SEALED* |
| John Mitchell   | 1:23-cr-00143             |
| John Mitchell   | 1:23-cr-00277             |
| John Mitchell   | 1:23-cr-00307             |
| Matthew Madden  | 1:01-cr-00957             |
| Matthew Madden  | 1:02-cr-00042             |
| Matthew Madden  | 1:02-cr-00478             |
| Matthew Madden  | 1:02-cr-00495             |
| Matthew Madden  | 1:04-cr-00899             |
| Matthew Madden  | 1:05-cr-00409             |
| Matthew Madden  | 1:05-cr-00492             |
| Matthew Madden  | 1:05-cr-00602             |
| Matthew Madden  | 1:06-cr-00225             |
| Matthew Madden  | 1:07-cr-00002             |
| Matthew Madden  | 1:07-cr-00364             |
| Matthew Madden  | 1:07-cr-00378             |
| Matthew Madden  | 1:07-cr-00410             |
| Matthew Madden  | 1:08-cr-00116             |
| Matthew Madden  | 1:08-cr-00426             |
| Matthew Madden  | 1:09-cr-00154             |
| Matthew Madden  | 1:09-cr-00310             |
| Matthew Madden  | 1:09-cr-00685             |
| Matthew Madden  | 1:10-cr-00394             |
| Matthew Madden  | 1:10-cr-00971             |
| Matthew Madden  | 1:10-cr-01071             |
| Matthew Madden  | 1:11-cr-00604             |
| Matthew Madden  | 1:14-cr-00730             |
| Matthew Madden  | 1:19-cv-07528             |
| Matthew Madden  | 1:91-cr-00952<br>*SEALED* |
| Matthew Madden  | 3:13-cr-50051             |
| Michelle Kramer | 1:05-cr-00471             |
| Michelle Kramer | 1:08-cr-00746             |
| Michelle Kramer | 1:09-cr-00669             |
| Michelle Kramer | 1:20-cr-00602             |
| Michelle Kramer | 1:20-cr-00812             |
| Michelle Kramer | 1:21-cr-00052             |
| Michelle Kramer | 1:21-cr-00152             |

|                               |                           |
|-------------------------------|---------------------------|
| Michelle Kramer               | 1:21-cr-00392             |
| Michelle Kramer               | 1:22-cr-00115             |
| Michelle Kramer               | 1:22-cr-00450             |
| Patrick Mott                  | 1:02-cr-00665             |
| Patrick Mott                  | 1:15-cr-00689             |
| Patrick Mott                  | 1:16-cr-00638             |
| Patrick Mott                  | 1:17-cr-00522             |
| Patrick Mott                  | 1:17-cr-00556             |
| Patrick Mott                  | 1:21-cr-00433             |
| Patrick Mott                  | 1:21-cr-00626             |
| Patrick Mott                  | 1:22-cr-00046             |
| Patrick Mott                  | 1:22-cr-00136             |
| Patrick Mott                  | 1:22-cr-00359             |
| Patrick Mott                  | 1:22-cr-00675             |
| Patrick Mott                  | 1:23-cr-00066<br>*SEALED* |
| Patrick Mott                  | 1:23-cr-00121             |
| Patrick Mott                  | 1:23-cr-00227             |
| Patrick Mott                  | 1:23-cr-00228<br>*SEALED* |
| Patrick Mott                  | 1:23-cr-00229             |
| Patrick Mott                  | 1:23-cr-00230             |
| Patrick Mott                  | 1:23-cr-00231             |
| Patrick Mott                  | 1:23-cr-00232             |
| Patrick Mott                  | 1:23-cr-00240             |
| Patrick Mott                  | 1:23-cr-00372             |
| Patrick Mott                  | 1:23-cr-00384             |
| Saurish Appleby-Bhattacharjee | 1:18-cr-00440             |
| Saurish Appleby-Bhattacharjee | 1:19-cr-00729             |
| Saurish Appleby-Bhattacharjee | 1:19-cv-07528             |
| Saurish Appleby-Bhattacharjee | 1:20-cr-00042             |
| Saurish Appleby-Bhattacharjee | 1:20-cr-00897             |
| Saurish Appleby-Bhattacharjee | 1:21-cr-00511             |
| Saurish Appleby-Bhattacharjee | 1:22-cr-00599             |
| Saurish Appleby-Bhattacharjee | 1:23-cr-00412             |
| Saurish Appleby-Bhattacharjee | 1:23-cr-00413             |
| Saurish Appleby-Bhattacharjee | 1:23-cr-00574             |
| Saurish Appleby-Bhattacharjee | 1:23-cr-00575             |
| Saurish Appleby-Bhattacharjee | 1:23-cr-00576             |
| Sean Franzblau                | 1:03-cr-01075             |
| Sean Franzblau                | 1:13-cr-00563             |
| Sean Franzblau                | 1:13-cr-00950             |
| Sean Franzblau                | 1:14-cr-00510             |
| Sean Franzblau                | 1:17-cr-00234             |

|                |                           |
|----------------|---------------------------|
| Sean Franzblau | 1:17-cr-00316             |
| Sean Franzblau | 1:17-cr-00457<br>*SEALED* |
| Sean Franzblau | 1:17-cr-00544             |
| Sean Franzblau | 1:17-cr-00556             |
| Sean Franzblau | 1:19-cr-00158             |
| Sean Franzblau | 1:19-cr-00192             |
| Sean Franzblau | 1:19-cr-00699             |
| Sean Franzblau | 1:19-cr-00700<br>*SEALED* |
| Sean Franzblau | 1:19-cr-00766             |
| Sean Franzblau | 1:20-cr-00741<br>*SEALED* |
| Sean Franzblau | 1:21-cr-00614             |
| Sean Franzblau | 1:22-cr-00143             |
| Sean Franzblau | 1:22-cr-00145             |
| Sean Franzblau | 1:22-cr-00621             |
| Sean Franzblau | 1:23-cr-00017             |
| Sean Franzblau | 1:23-cr-00555             |
| Sean Franzblau | 1:23-cr-00585             |